

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Kronospan Limited

**Chirk Particleboard Factory
Holyhead Road
Chirk
Wrexham
LL14 5NT**

Variation number

EPR/BW9999IG/V010

Permit number

EPR/BW9999IG

Chirk Particleboard Factory

Permit number EPR/BW9999IG

Introductory note

This introductory note does not form a part of the notice.

The following notice gives notice of the variation and consolidation of an environmental permit.

The substantial variation is for an increase in the emission limit value (ELV) on permitted emission point A32 (WESP 21). The variation also includes the reducting of A5 and A6 emission pnts to A28 (WESP32) via the operational Wet Electrostatic Precipitator (WESP32).

These changes have been consolidated into the permit.

The schedules specify the changes made to the permit.

The status log of a permit sets out the permitting history, including any changes to the permit reference number.

| Status log of the permit | | |
|---|---------------------------|---|
| Description | Date | Comments |
| Application BW9999IG (EPR/BW9999IG/A001) | Received 28/11/03 | Duly made, Supersedes withdrawn application BR7194 |
| Additional information via Schedule 4 | Request dated 23/02/04 | Response in part dated 19/04/04 |
| Additional information via Schedule 4 | | Noise survey 21/05/04 |
| Re-submission of Schedule 4 response | Request dated 26/05/04 | Information received on 30/06/04 |
| Permit determined BW9999IG (EPR/BW9999IG/A001) | 17/09/04 | |
| Variation notice KP3735SC. Issued (EPR/BW9999IG/V002) | 05/04/06 | Re-issue of conditions to account for administrative errors and to change emission limits values from the original permit |
| Variation application EPR/BW9999IG/V003 | Duly Made 02/12/08 | |
| Variation application EPR/BW9999IG/V003 issued | 28/04/09 | |
| Variation application EPR/BW9999IG/V004 | Duly Made 18/05/10 | |

| Status log of the permit | | |
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| Description | Date | Comments |
| Variation application EPR/BW9999IG/V004 issued | 22/08/10 | |
| Variation application EPR/BW9999IG/V005 | Duly Made 28/10/10 | |
| Variation application EPR/BW9999IG/V005 issued | 08/12/10 | |
| Variation application EPR/BW9999IG/V006 | Duly Made 05/01/16 | |
| Variation application EPR/BW9999IG/V006 issued | 01/02/16 | |
| Variation application EPR/BW9999IG/V007 | Duly Made 13/01/17 | Substantial variation to include combustion plant |
| Additional information requested | 08/03/17 | Schedule 5 Notice |
| Additional information received | 28/03/17 | Updated site plan, clarification regarding release of trade effluent to sewer from combustion plant, gas engine emissions monitoring point assessment and additional information on the air quality assessment. |
| Additional information received | 13/04/17 | Information describing control of NO _x and CO emissions from gas engines |
| Additional information requested | 19/05/17 | Schedule 5 Notice |
| Additional information received | 26/05/17 & 09/06/17 | Updated site plan, clarification regarding release of trade effluent to sewer from combustion plant, gas engine tuning settings, updating modelling for K7 at 6% O ₂ reference oxygen content, & predicted impacts associated with half-hourly and daily NO _x ELVs, when all dryers are offline. Also, predicted NO _x PCs and PECs at ecological receptors under "Limits Case". |
| Additional information requested | 03/07/17 | Email to: R.Flavell (Fichtner) (cc; K Baker, Kronospan) |
| Additional information requested | 05/07/17 | Email to: R.Flavell (Fichtner) (cc; K Baker, Kronospan) |
| Additional information received | 12/07/17 | Updated PCs and PECs for the "Limits Case" ecological assessment, following under- |

| Status log of the permit | | |
|---|-----------------------|--|
| Description | Date | Comments |
| | | estimation for some modelling scenarios. Assessment of predicted impact on European Sites for Nutrient Nitrogen and Acid Deposition. Provision of modelling assessment for Berwyn SPA. |
| Additional information received | 26/07/17 | Revised acid deposition predictions for woodland habitats following error in previous calculations. Clarification on predicted releases from site when K7 and K8 are offline compared with releases when MDF2 is offline for the Likely, Limits and Worst Cases. |
| Additional information received | 16/08/17 | Provision of predicted impact on human health under the Limits Case when MDF2 is offline for annual and daily mean NO _x . Also predicted daily mean NO _x impact at Canal Wood LWS and Chirk Castle ancient woodland. |
| Variation determined EPR/BW9999IG/V007 | 30/11/17 | |
| Variation and consolidation application EPR/BW9999IG/V008 received | Duly made 27/07/18 | Application for new OSB Production line; consolidation of extant WCBC & NRW permits to implement WG Direction; Natural Resources Wales Production of Wood-based Panels Sector Review |
| Additional information requested | 01/08/18 | Email |
| Additional information received | 02/08/18 | Email confirmation that the Sawmill and Laminated Flooring Line are both EPR Section 6.6 B (a) i activities. (Response to email request on 01/08/18). |
| Additional information requested | 23/11/18 | Schedule 5 Notice |
| Regulation 61 Notice sent to the Operator | 15/01/19 | Issue of a Notice under Regulation 61(1) of the Environmental Permitting (England and Wales) Regulations 2016 requiring further information on expected compliance with the "Large Volume Organic Chemicals BAT Conclusions" and |
| Variation and consolidation application number EPR/BW9999IG/V010 | Page iv | 15/09/2023 |

Status log of the permit

| Description | Date | Comments |
|----------------------------------|-------------------------------|---|
| | | “Common Waste Water and Waste Gas Treatment / Management Systems in the Chemical Sector BAT Conclusions”. The purpose of this request is to gather information to inform a forthcoming NRW review of the permit against these best practice documents. |
| Additional information received | 21/01/19, 23/01/19 & 24/01/19 | Schedule 5 Notice response covering, air quality assessment, Kronoplus Ltd operations, noise assessment and more detailed comparison of Kronospan Ltd's operations against the Wood Panel BREF BAT Conclusions. |
| Additional information requested | 08/04/19 | Schedule 5 Notice |
| Additional information requested | 03/05/19 | Query on waste types accepted by K7. (Grades of wood part of the question no longer relevant). |
| Additional information received | 28/05/19 | Schedule 5 Notice response (including response to 03/05/19 email query) covering: Identification of which legal entities control each regulated activity. Provision of updated noise assessment, noise modelling for on-site traffic and complaints log template. Clarification on Air Quality Assessment Input tables, status of Gas Engines 4 & 5, plume abatement on the newly constructed WESP 21, items of combustion plant using Light Fuel Oil as a secondary fuel and which combustion plant the report in Appendix E of the variation application is relevant to. Clarification of raw material usage, water use, releases to sewer, relevant to proposed OSB process. Clarification on waste types used in on-site processes. |
| Additional information requested | 04/06/19 | Email |
| Additional information received | 05/06/19 | Email: 2016 site baseline noise assessment & clarification on |

| Status log of the permit | | |
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| Description | Date | Comments |
| | | NVC report appendices. (Response to email request on 04/06/19). |
| Additional information requested | 10/06/19 | Email |
| Additional information requested | 11/06/19 | Email requesting clarification of the relationship between Kronospan Ltd and the companies operating the Part B activities for accounting purposes. |
| Additional information received | 12/06/19 | Justification for air quality modelling scenarios used for ecological assessment (response to email request on 10/06/19) |
| Additional information requested | 27/06/19 | Email |
| Additional information received | 02/07/19 | Email: Demonstration of Kronospan Ltd operator control of Part B activities (response to email request on 11/06/19). |
| Additional information received | 02/07/19 | Kronospan response to Regulation 61(1) notice requiring further information on expected compliance with the "Large Volume Organic Chemicals BAT Conclusions" and "Common Waste Water and Waste Gas Treatment / Management Systems in the Chemical Sector BAT Conclusions". |
| Additional information received | 03/07/19 | Email: Boiler Fuel Creation Procedure. (Response to email request on 27/06/19). |
| Additional information requested | 12/07/19 | Email |
| Additional information received | 12/07/19 | Email: clarifying sources of releases from WESPs 32 and 21 (response to email request on 12/07/19). |
| Additional information requested | 23/07/19 | Schedule 5 Notice |
| Additional information received | 30/09/19 | Schedule 5 Notice response covering: press abatement emissions dispersion from original WESP 32, location of bag filter abatement plant and associated emissions, K8 ammonia modelling, justification of habitats |

| Status log of the permit | | |
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| Description | Date | Comments |
| | | assessment scenarios, critical loads assessment for key ecological interest features, updated noise modelling, OSB BAT assessment, segregation of K7 and K8 boiler fuel and updated emission point plan. |
| Additional information received | 04/10/19 | Air Quality and Noise Modelling Files in support of Schedule 5 response. |
| Additional information requested | 25/10/19 | Email |
| Additional information requested | 29/10/19 | Email |
| Additional information received | 29/10/19 | Email confirmation that Kronospan wish to retain half-hour average ELVs and legal ability for abnormal operation of K8 Biomass Boiler in NRW permit. Confirmation of CEM arrangements for K8. (Response to email request on 29/10/19). |
| Additional information received | 31/10/19 | Amended emission point plan and plan showing release points from bag filter abatement plant. (Response to email request on 29/10/19) |
| Additional information received | 08/11/19 | Email: Amended Boiler Fuel Creation procedure (Part response to email request on 25/10/19). |
| Additional information requested | 13/11/19 | Email |
| Additional information requested | 22/11/19 | Email |
| Additional information received | 22/11/19 | Email: Air Quality Assessment for OSB Planning application, response to press abatement modelling questions and source of WESP 32 emission limits. Results of fuel trials on K7 Boiler. (Results of fuel trials are part response to email request on 13/11/19) |
| Additional information received | 28/11/19 | Finished Product Composition (response to email dated 22/11/19) |
| Confidentiality decision | 20/12/19 | Decision to accept the objection |

Status log of the permit

| Description | Date | Comments |
|---|--------------------------------|--|
| following objection notice received from operator on 28/11/19 | | notice received from the operator in relation to specified information received as part of the application. |
| Additional information received | 09/01/20 | Further review of dust extraction units, with technical data sheets and updated modelling. |
| Additional information requested | 15/01/20 | Follow-up noise questions following assessment of Schedule 5 response #3. |
| Additional information requested | 05/02/20 | Schedule 5 Notice |
| Additional information received | 16/03/20 & 09/04/20 & 12/04/20 | Schedule 5 Notice Part Response covering: modelling supporting K1 increased NO _x ELV, modelling of additional pollutants for K7, AQ modelling of half hourly averages for K8, confirmation of K8 auxiliary fuel, Abnormal Emissions Impact Assessment for K8 and HHRA addendum to include fisher receptor. Air Quality Modelling files in support of response. Background noise monitoring question not answered due to Covid-19 restrictions. |
| Additional information requested | 06/05/20 & 27/05/20 | Emails requesting confirmation of current trade effluent emission points |
| Additional information received | 21/05/20 & 27/05/20 | Emails confirming current trade effluent emission points |
| Additional information received | 15/07/20 | Letter from Kronospan following NRW & Kronospan meeting on 9 July 2020. Confirms understanding of postponing determination of OSB development and removing from this variation. This is due to difficulty of obtaining up to date background noise data due to Covid-19 restrictions. (Superseded by correspondence sent to Kronospan dated 18/03/22 advising submission of a new application for OSB in the light of design changes since the original application PAN-002755). |
| Additional information requested | 08/10/20 | Schedule 5 Notice |

Status log of the permit

| Description | Date | Comments |
|----------------------------------|--------------------------------------|---|
| Additional information received | 27/11/20, 02/12/20, & 10/12/20 | Schedule 5 Notice response covering: Site plans including emission points, modelling of particulate emissions and design specification for bag filter abatement plant, points of clarification in relation to air modelling from third and fourth Schedule 5 responses, in-combination habitats assessment for European Sites, updated Fire Prevention and Mitigation Plan and noise assessment for Chip Dryer No. 4. |
| Additional information requested | 02/12/20 | Email requesting clarification and submission of noise modelling files for New Chip Dryer 4 |
| Additional information received | 02/12/20 | Noise modelling files for new Chip Dryer 4 |
| Additional information requested | 07/12/20 | Emails requesting clarification on calculation of K1 emission rate & submission of 4 x missing bag filter data sheets. |
| Additional information received | 10/12/20 | 4 x missing bag filter data sheets submitted in response to email dated 07/12/20 |
| Additional information requested | 10/12/20 | Email querying Met data for K8 half-hourly ELVs model inputs |
| Additional information requested | 16/12/20 | Additional clarification sought on in-combination assessment provided as part of the fifth Schedule 5 Notice Response. |
| Additional information requested | 18/12/20 & 11/01/21 | Emails querying noise modelling for New Chip Dryer 4 |
| Additional information received | 23/12/20 | Clarification on K1 emission rate, Met data for K8 half-hourly ELV model inputs and updated in-combination assessment in response to follow up questions via emails dated 07/12/20, 10/12/20 & 16/12/20 |
| Additional information requested | 23/12/20 & 07/01/21 | Emails querying model inputs for WESP 32 Press abatement releases |
| Additional information received | 21/01/21 | Amended site plan with air emission point A29 removed. |
| Additional information received | 22/01/21 & 15/03/21 | Emails clarifying queries on noise modelling for new Chip Dryer 4 |

| Status log of the permit | | |
|---|-------------|---|
| Description | Date | Comments |
| | | (email request dated 18/12/20). |
| Additional information requested | 26/01/21 | Email: Confirmation of modelling scenarios required for WESP 32 Press abatement releases and plume visibility analysis. |
| Additional information requested | 09/02/21 | Email: follow up noise questions based on email response of 22/01/21 |
| Additional information received | 03/03/21 | Press abatement and plume visibility modelling for WESP 32 (response to email dated 26/01/21) |
| Additional information received | 08/03/21 | Email: revised and updated noise modelling files verifying noise reduction associated with new wood chip preparation plant (response to email dated 09/02/21) |
| Additional information requested | 16/07/21 | Schedule 5 Notice |
| Additional information provided to Operator | 22/07/21 | Spreadsheet of Medium Combustion Plant permits issued in North & Mid Wales regions to inform scope of habitats in-combination assessment. |
| Additional information received | 31/07/21 | Response to Schedule 5 Notice dated 16/07/21. Consolidated Air Quality Modelling report for the installation. |
| Additional information requested | 19/08/21 | Email: Process flow diagram for WESP 21 |
| Additional information requested | 25/08/21 | Email: Excel spreadsheet of emission calculations underpinning air quality modelling and priority order for other Schedule 5 follow up items. |
| Additional information requested | 26/08/21 | Email request for consolidated Air Quality modelling report to address inconsistencies identified from initial review of Schedule 5 response dated 31/07/21. |
| Additional information received | 10/09/21 | Updated Consolidated Air Quality Modelling report addressing the inconsistencies identified in emails dated 25/08/21 & 26/08/21. |
| Additional information received | 15/12/21 | Updated consolidated air quality modelling report addressing |

| Status log of the permit | | |
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| Description | Date | Comments |
| | | habitats issues with acid deposition process contributions and critical loads for assessment. |
| Additional information requested | 17/12/21 | Email: Feasibility of meeting Likely Case NO _x emission limits in terms of normal process fluctuations. |
| Additional information received | 11/01/22 | Email: Emissions monitoring results for WESP 21 and MDF 1 & 2 cyclones. (response to email dated 17/12/21) |
| Notice of Deemed Withdraw PAN-002755 | 15/06/22 | OSB development proposals partially deemed withdrawn from this variation. |
| Variation determined Consolidated Permit: EPR/BW9999IG | 04/10/22 | Varied and consolidated permit issued in modern IED condition format. The following permits have been consolidated: EPR/BW9999IG and WCBC/IPPC/03/KR(V3). |
| Regulation 61 Notice Response from Operator | 31/01/2023 | Response received from Operator to Regulation 61(1) Notice dated 15/01/2019. |
| Additional information received | 24/03/2023 | Additional response to Regulation 61(1) Notice from Operator |
| Natural Resources Wales initiated variation determined EPR/BW9999IG/V009 | 16/05/2023 | Natural Resources Wales initiated review and variation to vary the permit following the publication of the revised Best Available Techniques (BAT) Reference Documents. |
| Variation Application (PAN-021028) EPR/BW9999IG/V010 | Duly Made 06/03/2023 | Application to change ELV from WESP 21 for oxides of nitrogen and reduct emission points A5 & A6 to WESP 32. |
| Additional information requested. | 30/05/2023 | Clarification on emission limits at A28 & 31 with re-ducting of A5 & A6 to WESP 32 (A28). Schedule 5 Notice dated 30/5/2023. |
| Additional information received. | 13/06/2023 | Email in response to Schedule 5 Notice 30/5/2023 regarding emission limits at A28 & A31. |
| Additional information requested. | 19/06/2023 | Schedule 5 Notice. Clarification of emission point for the proposed change in emission limit value. |
| Additional information received. | 21/06/2023 | Email in response to Schedule 5 Notice 19/06/2023. Resubmission of air quality report and |

| Status log of the permit | | |
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| Description | Date | Comments |
| | | supporting information to correct emission point reference change. |
| Additional information received. | 21/06/2023 | Email in response to Schedule 5 Notice 19/06/2023. Letter regarding emission point A32. |
| Variation determined EPR/ BW9999IG/V010 | 15/09/2023 | Varied and consolidated permit issued. |

End of introductory note

Notice of variation and consolidation

The Environmental Permitting (England and Wales) Regulations 2016

The Natural Resources Body for Wales (“Natural Resources Wales”) in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 varies and consolidates

Permit number

EPR/BW9999IG

issued to

Kronospan Limited (“the operator”)

whose registered office is

Kronospan Limited

Maesygywn Farm

Chirk

Wrexham

LL14 5NT

company registration number **00981905**

to operate a regulated facility at

Chirk Particleboard Factory

Holyhead Road

Chirk

Wrexham

LL14 5NT

to the extent set out in the schedules.

The notice shall take effect from 15/09/2023

Signed

Date

| | |
|--------------------|-------------------|
| Holly Noble | 15/09/2023 |
|--------------------|-------------------|

Authorised on behalf of Natural Resources Wales

Schedule 1

All conditions have been varied by the consolidated permit as a result of an Natural Resources Wales initiated variation.

Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

[End]